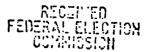
FEDERAL ELECTION COMMISSION



2012 JAN 11 PH 2: 52

In the matter of:

Republican Party of Minnesota Anthony G. Sutton, individually and in his capacity as Treasurer OFFICE OF GENERAL COUNSEL 1

COMPLAINT

1. Citizens for Responsibility and Ethics in Washington ("CREW") and Melanie
Sloan bring this complaint before the Federal Election Commission ("FEC") seeking an
immediate investigation and enforcement action against the Republican Party of Minnesota and
Anthony G. Sutton, individually and as treasurer of the Republican Party of Minnesota, for direct
and serious violations of the Federal Election Campaign Act ("FECA").

Complainants

- 2. Complainant CREW is a non-profit corporation, organized under section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the right of citizens to be informed about the activities of government officials and to ensuring the integrity of government officials. CREW is dedicated to empowering citizens to have an influential voice in government decisions and in the governmental decision-making process. CREW uses a combination of research, litigation, and advocacy to advance its mission.
- 3. In furtherance of its mission, CREW seeks to expose unethical and illegal conduct of those involved in government. One way CREW does this is by educating citizens regarding the integrity of the electoral process and our system of government. Toward this end, CREW monitors the campaign finance activities of those who run for federal office and publicizes those who violate federal campaign finance laws through its website, press releases and other methods

of distribution. CREW also files complaints with the FEC when it discovers violations of the FECA. Publicizing campaign finance violators and filing complaints with the FEC serves CREW's mission of keeping the public informed about individuals and entities that violate campaign finance laws and deterring future violations of campaign finance law.

- 4. In order to assess whether an individual, candidate, political committee or other regulated entity is complying with federal campaign finance law, CREW needs the information contained in receipts and disbursements reports that political committees must file pursuant to the FECA, 2 U.S.C. § 434(a)(2); 11 C.F.R. § 104.1. CREW is hindered in its programmatic activity when an individual, candidate, political committee, or other regulated entity fails to disclose campaign finance information in reports of receipts and disbursements required by the FECA.
- 5. CREW relies on the FEC's proper administration of the FECA's reporting requirements because the FECA-mandated reports of receipts and disbursements are the only source of information CREW can use to determine if a candidate, political committee or other regulated entity is complying with the FECA. The proper administration of the FECA's reporting requirements includes mandating that all reports of receipts and disbursements required by the FECA are properly and timely filed with the FEC. CREW is hindered in its programmatic activity when the FEC fails to properly administer the FECA's reporting requirements.
- 6. Complainant Melanie Sloan is the executive director of Citizens for Responsibility and Ethics in Washington, a citizen of the United States, and a registered voter and resident of the District of Columbia. As a registered voter, Ms. Sloan is entitled to receive information contained in reports of receipts and disbursements required by the FECA, 2 U.S.C. § 434(a)(2); 11 C.F.R. § 104.1. Ms. Sloan is harmed when a candidate, political committee or

other regulated entity fails to report campaign finance activity as required by the FECA. See FEC v. Akins, 524 U.S. 11, 19 (1998), quoting Buckley v. Valeo, 424 U.S. 1, 66-67 (1976) (political committees must disclose contributors and disbursements to help voters understand who provides which candidates with financial support). Ms. Sloan is further harmed when the FEC fails to properly administer the FECA's reporting requirements, limiting her ability to review campaign finance information.

Respondents

- 7. The Republican Party of Minnesota is a state committee within the meaning of 2 U.S.C. § 431(15).
- 8. Anthony G. Sutton was the treasurer of the Republican Party of Minnesota from May 14, 2007 through July 10, 2009 and the chairman of the Republican Party of Minnesota from July 1, 2009 through December 2, 2011.

Factual Allegations

- 9. On August 15, 2011, the FEC accepted a signed conciliation agreement with the Republican Party of Minnesota in Matter Under Review 5926 (attached as Exhibit 1). In that conciliation agreement, the Republican Party of Minnesota acknowledged that it had failed to disclose at least \$994,319 in outstanding debts to vendors during 2006 in violation of 2 U.S.C. § 434(b). Exhibit 1 at Section IV, ¶ 9. To resolve this violation of 2 U.S.C. § 434(b), the Republican Party of Minnesota agreed to pay a civil penalty of \$170,000. Exhibit 1 at Section VI. The Republican Party of Minnesota also expressly agreed to cease and desist from further violations of 2 U.S.C. § 434(b). Exhibit 1 at Section VII, ¶ 1.
- 10. On December 20, 2011, the Republican Party of Minnesota filed its December Monthly Report with the FEC (attached as Exhibit 2). The December Monthly Report indicates

that as of November 30, 2011 the Republican Party of Minnesota owed \$542,005.12 in debts and obligations. Exhibit 2 at 2, 130.

- 11. On December 30, 2011, the Republican Party of Minnesota held a news conference to announce that the party had conducted an internal financial review, revealing the party actually has approximately \$2,000,000 in debt, including \$415,211 in debts that have never been reported to the FEC. Baird Helgeson, State GOP \$2 million in debt, Minneapolis Star Tribune (December 30, 2011) (attached as Exhibit 3); Megan Boldt, Minnesota Republican Party debt could top \$2 million, St. Paul Pioneer Press (December 31, 2011) (attached as Exhibit 4).
- 12. The Star-Tribune reported, "The debt includes \$120,000 remaining on a \$170,000 fine levied by the Federal Election Commission from reporting discrepancies when [Anthony G.] Sutton was party treasurer. Republican executive committee members said they had been fighting with Sutton for months over the release of party financial information, and that they had not been able to get some of the documents they needed until after Sutton resigned. Before Sutton left, 'we knew we were being lied to,' said executive committee member Pat Anderson, former state auditor. Sutton was 'running wild' with party finances and 'hiding bills not only from the executive committee, but regulatory agencies, even the treasurer." Exhibit 3 (emphasis added).

COUNT I

13. FECA and FEC regulations require state committees, including the Republican Party of Minnesota, to disclose on their periodic reports to the FEC "the amount and nature of outstanding debts and obligations owed by" the state committee. 2 U.S.C. § 434(b)(8); 11 C.F.R. § 104.3(d). Moreover, FEC regulations require state committees to report debts and obligations that remain outstanding continuously until they are extinguished. 11 C.F.R. § 104.11(a). Debts

of \$500 or less must be reported not later than 60 days after the obligation is incurred. 11 C.F.R. § 104.11(b). Debts of more than \$500 must be reported as of the date the obligation is incurred.

Id.

14. The Republican Party of Minnesota and Anthony G. Sutton, as treasurer, knowingly and willingly violated the conciliation agreement in MUR 5926 by knowingly and willingly committing multiple violations of 2 U.S.C. § 434(b)(8) and 11 C.F.R. §§ 104.3(d), 104.11(a)&(b) by repeatedly failing to disclose debts and obligations totaling at least \$415,211.

COUNT II

- 15. FECA and FEC regulations require the treasurer of a state committee to maintain records of all debts and obligations and to preserve those records for a period of not less than three years. 2 U.S.C. § 432(d); 11 C.F.R. §§ 102.9(c), 104.14(b)(1)-(3). Specifically, the treasurer of a state committee is required to "[m]aintain records, . . . including vouchers, worksheets, receipts, bills and accounts, which shall provide in sufficient detail the necessary information and data from which the filed reports . . . may be verified, explained, clarified, and check for accuracy and completeness." 11 C.F.R. § 104.14(b)(1). Knowingly and willfully filing a report with the FEC that is materially false, fictitious, or fraudulent is also prohibited by 18 U.S.C. § 1001.
- 16. Anthony G. Sutton, both as treasurer of the Republican Party of Minnesota and subsequently as chairman of the Republican Party of Minnesota, knowingly and willfully violated 2 U.S.C. § 432(d), 11 C.F.R. §§ 102.9(c), 104.14(1)-(3) and 18 U.S.C. § 1001 by failing to maintain records of the debts and obligations of the Republican Party of Minnesota and by filing materially false reports with the Federal Election Commission.

CONCLUSION

WHEREFORE, Citizens for Responsibility and Ethics in Washington and Melanie Sloan request that the Federal Election Commission conduct an investigation into these allegations, declare the respondents to have violated the Federal Election Campaign Act and applicable FEC regulations, impose sanctions, and take such further action as may be appropriate, including referring this case to the Department of Justice for criminal prosecution of any violations of 2 U.S.C. § 434(b) or 18 U.S.C. § 1001.

Melanie Sloan

Executive Director

Citizens for Responsibility and Ethics

in Washington

1400 Eye Street, N.W.

Suite 450

Washington, DC 20005

(202) 408-5565 (phone)

(202) 588-5020 (fax)

Verification

Citizens for Responsibility and Ethics in Washington and Melanie Sloan hereby verify that the statements made in the attached Complaint are, upon information and belief, true.

Sworn pursuant to 18 U.S.C. § 1001.

Melanie Sloan

Sworn to and subscribed before me this 11th day of January, 2012.

Notary Public

Lisa Drew
District of Columbia, Notery Publis
My Commission Expires
July 31, 2014

EXHIBIT 1



AUG 17 2011

Michael E. Toner, Esq. Wiley Rein LLP 1776 K Street NW Washington, DC 20006

RE: MUR 5926
Republican Party of Minnesota and
David E. Sturrock, in his official
capacity as treasurer
Marina Taubanberger

Dear Mr. Toner:

On August 15, 2011, the Federal Election Commission accepted the signed conciliation agreement submitted on behalf of your clients, the Republican Party of Minnesota and David E. Sturrock, in his official espacity as treasurer, in settlement of violations of 2 U.S.C. §§ 434(b) and 441a(f), and 11 C.F.R. §§ 102.5(a) and 106.7(f), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), and Commission regulations. Additionally, on May 27, 2011, the Commission found that there is no reason to believe that Marina Taubenberger violated 2 U.S.C. § 434(b). Accordingly, the file has been closed in this matter.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66,132 (Dec. 14, 2009). Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B).

Enclosed you will find a copy of the fully executed canciliation agreement for your files. Please note that the initial \$20,000 payment of the civil penalty is due within 30 days of the conciliation agreement's enforced date. The Factoria and Lagri Analysis expining the Commission's finding as to Marina Taubanberger is also enclosed.

MUR 5926 (Republican Party of Minnesota) Michael B. Tones, Esq. Page 2

If you have any questions, please contact me at (202) 694-1650.

Sincerely,

Kosey S. Morganheim

Kasey S. Morgenheim Attorney

Enclosures Conciliation Agreement Factual and Legal Analysis



1 2	BEFORE THE FEDERAL ELECTION COMMISSION 2011 AUG 12 PH 3: 08
3 4 5 6 7 8 9	In the Matter of COU!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!
10 11	CONCILIATION AGREEMENT
12 13	This matter was initiated by a signed, sworn, and notarized complaint by Citizens for
14	Responsibility and Ethics in Washington ("CREW"), Melanic Sloan, and Diane Gerth, and
15	pursuant to information ascertained by the Federal Election Commission ("Commission") in the
16	normal course of carrying out its supervisory responsibilities. The Commission found probable
17	cause to believe that the Republican Party of Minnesota ("RPM" or "Committee") and David
18	B. Sturrock, in his official capacity as treasurer, (collectively, "Respondents") violated 2 U.S.C.
19	§§ 434(b) and 441a(f), and 11 C.F.R. §§ 102.5(a) and 106.7(f).
20	NOW, THEREFORE, the Commission and the Respondents, having duly cattered into
21	conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), do hereby agree as follows:
22	I. The Commission has jurisdiction over the Respondents and the subject matter of this
23	proceeding.
24	II. Respondents have had a reasonable opportunity to demonstrate that no action should be
25	taken in this matter.
26	III. Respondents enter voluntarily into this agreement with the Commission.
27	IV. The pertinent facts and law in this matter are as follows:
28	1. RPM is a political committee within the meaning of 2 U.S.C. § 431(4). RPM is a
29	state committee of a political party within the meaning of 2 U.S.C. § 431(15).

MUR 5926 (Republican Party of Minnesota) Conciliation Agreement Page 2 of 7

- 2. David E. Sturrock is the current treasurer of RPM. Mr. Sturrock was not the
 treasurer when the conduct that gave rise to this matter occurred.
- 3. The Federal Election Campaign Act of 1971, as amended ("the Act"), requires
 4 committees to disclose the nature and amount of outstanding debts and obligations in their
 5 reports. See 2 U.S.C. § 434(6)(8).
 - 4. Debts and obligations must be continuously reported until they are extinguished.

 11 C.F.R. § 104.11(a). Debts of \$500 or less must be reported no later than 60 days after the obligation is incurred, while debts of more than \$500 must be reported as of the date the obligation is incurred. 11 C.F.R. § 104.11(b).
 - 5. Section 104.11(b) of the Commission's regulations provides that regularly recurring administrative expenses will be treated as debt when payment is due. If a committee does not pay an employee for services rendered to the committee in accordance with an employment contract or a formal or informal agreement to do so, the unpaid amount may be treated as debt owed by the committee to the employee, or the employee can sign a written agreement to unevert his or her status to a volunteer. 11 C.F.R. § 100.74. If the unpaid amount is treated as debt, the committee must continue to separt the debt in expendence with 11 C.F.R. §§ 104.3(d) and 104.11 until the debt is extinguished, until the Commission has completed a review of a debt settlement plan pursuant to 11 C.F.R. § 116.7(f), or until the employee agrees to become a volunteer, whichever occurs first. 11 C.F.R. § 116.6.
 - 6. Between January 15, 2006 and May 31, 2006, or ten pay periods, RPM withheld retirement contributions totaling \$7,623 from four employees. During this time period, RPM did not make any payments to Ameriprise Financial Services ("AFS"), the vendor that maintained RPM employees' retirement accounts.

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MUR 5926 (Republican Party of Minnesota) Conciliation Agreement Page 3 of 7

1	7. On June 6 and 16, 2006, RPM made two "catch up" payments to AFS totaling
2	\$12,243. Beginning June 30, 2006, all funds withheld by RPM were forwarded on a monthly
3	basis.
4	8. RPM failed to report \$7,623 in withheld employee retirement contributions as deb
5	without either a dabt settlement plan or volunteer services agreement in violation of
6	2 U.S.C. § 434(b).
7	9. RPM failed to disclose at least \$994,319 in outstanding debt to vendors during
8	2006 in violation of 2 U.S.C. § 434(b). Of this total, RPM has not disclosed \$552,867 in debts
9	owed to four of its vendors during calendar year 2006, and RPM disclosed \$441,452 in May
10	2008 when it filed amendments to its 2006 disclosure reports. The majority of this \$441,452 in
1	additional debts was disclosed on multiple amended 2006 reports because they were repaid after
12	several reporting periods. The total of \$441,452 is the total of the increases in debt on each
13	report. The amended reports disclosed a total of \$83,277.49 in unique debt that had not been
14	disclosed on the original reports.
15	10. RPM also failed to report unrelimbursed staff expense reports as cutstanding debt
16	in violation of 2 U.S.C. § 434(b).
17	il. The Act provides that no person shall make contributions to a state party
18	committee's federal account in any calendar year which in the aggregate exceed \$10,000, and
19	prohibits the state committee from knowingly accepting such contributions. 2 U.S.C. § 441a(a)
20	and (f).
21	12. Under Minnesota campaign finance law, there is no contribution limit for
22	permissible sources giving to political parties. See Minnesota Statute Chapter 10A, Section 27.

MUR 5926 (Republican Party of Minnesota) Conciliation Agreement Page 4 of 7

1	13. Where a committee has established both a federal and a non-federal account, only
2	funds subject to the limitations and prohibitions of the Act shall be deposited into such separate
3	federal account. 11 C.F.R. § 102.5(a)(1)(i).
4	14. A state party committee may transfer funds from its non-federal account to its
5	federal account solely to meet allocable expenses, such as administrative costs that are not
6	directly attributable to a clearly identified federal candidate. 11 C.F.R. § 106.7(f). Under this
7	provision, the committee must pay the entire amount of an allocable expense from its federal
8	account and transfer funds from its non-federal account to the foderal account solely to cover the
9	non-federal share of that allocable expense. 11 C.F.R. § 106.7(f)(1)(i).
0	15. RPM incurred \$2,736,692 in administrative expenses during the 2006 election
1	cycle. The federal share of these expenses totaled \$574,342 and the non-federal share totaled
2	\$2,162,350. During this same time period, RPM made 51 transfers from its non-federal account
3	totaling \$2,723,202.
4	16. RPM made \$560,852 in excessive transfers from its non-federal account to its
5	federal account for allocated administrative expenses in violation of 2 U.S.C. § 441a(f) and
6	11 C.F.R. §§ 102.5(a) and 106.7(f).
7	17. RPM contends that the errors and omissions in its 2006-2008 reports were not
8	intentional and in 2007-2008 RPM acted proactively to address the issues involved by retaining
9	an accounting firm to conduct a comprehensive audit of its financial records. In 2008 RPM
0:	further acted proactively to address the issues involved by filing more than 50 amendments to its
21	reports. However, these amendments did not disclose all previously undisclosed debt. RPM has
2	taken affirmative steps to ensure that such errors and omissions do not occur again by retaining a

MUR 3926 (Republican Party of Minnesota) Conciliation Agreement Page 5 of 7

- l compliance company to prepare its reports, as well as federal campaign finance counsel that
- 2 serves as counsel to a number of Republican state party committees.
- 3 V. Respondents committed the following violations:
- Respondents violated 2 U.S.C. § 434(b) by falling to report debts and obligations.
- 5 2. Respondents violated 2 U.S.C. § 441a(f) and 11 C.F.R. §§ 102,5(a) and 106.7(f) by
- 6 making excessive transfers from the Committee's non-federal excount to its federal excount for
- 7 allocated administrative expenses.
- 8 VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of
- 9 One Hundred and Seventy Thousand Dollars (\$170,000) pursuant to 2 U.S.C.
- 10 § 437g(a)(5)(A). The civil penalty will be paid as follows:
- 1. A payment of Twenty Thousand Dollars (\$20,000) is due no more than thirty (30)
- 12 days from the date this Agreement becomes effective;
- 13 2. Thereafter, ten consecutive monthly installment payments of Fifteen Thousand
- 14 Dollars (\$15,000) each;
- 15 3. Each such installment shall be paid within thirty (30) days of the due dute of the
- 16 previous installment.
- 17 4. In the event that any installment payment is not received by the Commission by the
- 18 fifth day after which it becomes due, the Commission may, at its discretion, accelerate the
- 19 remaining payments and cause the entire amount to become due upon ten days written notice to
- 20 the Respondents. Failure by the Commission to accelerate the payments with regard to any
- 21 overdue installment shall not be construed as a waiver of its right to do so with regard to future
- 22 overdue installments.

24

MUR 5926 (Republican Party of Minnesota) Conciliation Agreement Page 6 of 7

1	VII. 1. Respondents will cease and desist from violating 2 U.S.C. §§ 434(b) and 441a(f) and
2	11 C.F.R. §§ 102.5(a) and 106.7(f).
3	2. Respondents will take the following steps:
4 5	A. Require RFM personnel responsible for preparing RPM's reports and complying
6	with the Act and Commission regulations to attend a Commission-spensored training program
7	during 2011-2012. Respondents shall submit to the Commission evidence of registration and
8	attendance at such event.
9	B. Prepare an internal training manual, prepared by experienced federal campaign
0	finance counsel, to assist appropriate personnel in understanding the reporting requirements of
1	the Act and Commission regulations. Within five months of the effective date of this
[2	Agreement, Respondents shall submit to the Commission a copy of their internal training
13	manual.
L4	C. Retain experienced federal campaign finance counsel to review RPM reports
15	before they are filed with the Commission.
16	VIII. Respondents will amend the selevant 2006 disclosure reports to accurately seffect debts and
17	obligations referenced at paragraphs IV.I and IV.9 within 60 days.
18	IX. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1)
19	concerning the matters at issue herein or on its own motion, may review compliance with
20	this agreement. If the Commission believes that this agreement or any requirement thereof
21	has been violated, it may institute a civil action for relief in the United States District Cour
22	for the District of Columbia.
23	X. This agreement shall become effective as of the date that all parties hereto have executed

same and the Commission has approved the entire agreement.

MUR. 5926 (Republican Party of Minnesota) Conciliation Agreement Page 7 of 7

1	KI. Respondents shall have no more than 30 days from the date this agreement becomes
2	effective, unless otherwise specified, to comply with and implement the requirements
3	contained in this agreement and to so notify the Commission.
4	XII. This Conciliation Agreement constitutes the entire agreement between the parties on the
5	matters raised herein, and no other statement, promise, or agreement, either written or oral,
6	made by either party or by agents of either party, that is not contained in this written
7	agreement shall be enforceable.
. 8	FOR THE COMMISSION:
9 10 11 12 13 14 15 16	Christopher Hughey Acting General Counsel BY: Kathleen M. Guith Acting Associate General Counsel for Enforcement
17 18 19 20 21 22 23 24	FOR THE RESPONDENTS: Course For the party of Minnesota The party

EXHIBIT 2

FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS For Other Than An Authorized Committee

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SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

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Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)),),	ga ay ka ay madaasta miga ah ah ah - 83058 . 3 ah 1 ah 1 ah 2 ah 2 ah 2 ah 2 ah 2 ah 2	772 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	-83058.72 -83058.03
Debts and Obligations Owed the Committee (Itemize all on Schedule C and/or Schedule	والمستري فالمنتهي	g mangga agun angan ganaran sa sakira sag Ang Magazaran di sa Magasaka sakira sa	rrengiver O §	
Debts and Obligations Owed the Committee (Itemize all on Schedule C and/or Schedule	<u> </u>	giss year, est engli ekset gelig 542005 sougskelder ensemble sitte skap s	.12	
This committee has qualif	led as a multicandidate of	committee. (see FEC FOR	M 1M)	
	For fur	ther Information cont	act:	
		ral Election Commissio 999 E Street, NW ashington, DC 20463	n	
		nii Free 800-424-9530 Local 202-694-1100		

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	FEC Form 3X (Rev. 06/2004)	ETAILED SUMMARY PAGE of Receipts	Page 3
Wr	ite or Type Committee Name		
R	epublican Party of Minnesota		
•••	ş ^a Vîn A	M. F. 1844 M. F. S. A. J.	CREEK I SALARA I BALARA HA
Re		1 01 2011 To	o: 11 30 2011
	I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11.	Contributions (other thad loans) From:		
	(a) Individuals/Persons Other		
	Than Political Committees	87041	gen vol. – přema na příma věský větký vatovním vol. pou spetia. 748020.9
	(i) Itemized (use Schedule A)	Therefore service the section of the	A contraction of the second of the second contraction of the second co
		7	•
	(ii) Unitemized	61616.43	B82589.45 Annaha and makkana an maanakha a lagadh a dheadh a dhea
	(iii) TOTAL (add		1711609.35
	Lines 11(a)(i) and (ii)	148657.43	The state of the s
	/h) Deliver De A. Con eller	0	0
	(b) Political Party Committees	The first open is the design of the other control and a set of the first of the fir	Burner Base males and Base Marchaeller (1944), and seeding a place of the seed
	(c) Other Political Committees	15000	49260.72
	(such as PACs)	But some the same of the same	has a great of the court of the control of the cont
	(d) Total Contributions (add Lines	The state of the s	gan timen kan mendigan menganan kan mengan kan pelanggan dibergan dibergan dibergan dibergan dibergan dibergan
	11(a)(iii), (b), and (c)) (Carry	163657.43	1760870.07
10	Totals to Line 33, page 5)	have married speech of the one thought of house	Burgarding and grad Miller than a control Miller to the profile of the control of
۱2.	Transfers From Affiliated/Other	 Start for expect in place by the refer of the hydron period and shifts of the particle of the par	17000
	Party Committees	and the second of the second o	The company of the control of the co
12	All Loans Received	0	0
١٠٠.	All Loans Heggived	The supplies of the state of the things the tight of affine the confi	Same we will have the same within the called down from
		ga interpretage to the extremely more than the property and the property of the contract of th	And the second section of the section of the second section of the second section of the second section of the second section of the second section of the second section of the second section of the second section of the second section of the second section of the second section of the section of the second section of the sec
	Loan Repayments Received	The second secon	and the state of t
	Offsets To Operating Expenditures		
	(Refunds, Rebates, etc.)	্ত ভাতু কাৰ্য কৰা জ্বলাজৰ কলক কৰিবলৈ কাৰ্য কৰা কৰিবলৈ জ্বলাজ্বীয়া কৰিবলৈ কৰিবলৈ জ্বলাজ্বীয়া কৰিবলৈ কৰিবলৈ জ্বলাজ্বীয়া কৰিবলৈ জ্বলাল জ্বলাজ্বীয়া কৰিবলৈ জ্বলাজ্বীয়া কৰিবলৈ জ্বলাজ্বীয়া কৰিবলৈ জ্বলাল জ্বলাজ্বীয়া কৰিবলৈ জ্বলাজ্বীয়া কৰিবলৈ জ্বলাজ্বলাল জ্বলাল জ্বলাজ্বলা কৰিবলৈ জ্বলাল জ্বলাল জ্বলাল জ্বলাল জ্বলাল জ্বলাল জ্বল	ga pangan bagah saja dingan dingan magangdigi dingan mga an mga tali. B
	(Carry Totals to Line 37, page 5)	The hours of the hours of the same of the	15346.07
16.	Refunds of Contributions Made		
	to Federal Candidates and Other	The state of the second of the statement	and the state of the same of the same of the state of the
	Political Committees	Branda in Africa San San Branding in Albertaine	and the state of t
17,	Other Federal Receipts	But the same of the sale of th	ga har galaga sagaran jarah hagaran da menganan hali dan gajajah adalah jajah. Beraparan
	(Dividends, Interest, etc.)	The stage of the s	i 5107.43 English sayari ya 21 ya 22 ya 24 ya 24 ya 25 ya 26 ya 26 ya 26 ya 26 ya 26 ya 26 ya 26 ya 26 ya 26 ya 26 ya 26
18.	Transfers from Non-Federal and Levin Fund	5	
	(a) Non-Federal Account	gradient in der eine gegen der eine der eine der eine der eine der eine der eine der eine der eine der eine der	pare to the first programme was training to the
	(from Schedule H3)	t 2600 (242690.08 ***********************************
		The same of the first of the same of the s	The many control of the part of the control of the
	(b) Levin Funds (from Schedule H5)	يۇ. 0 ئالىرىقى ھەھەردىق دارىيىن ئالىرى دارىق ئايىسى ئارىيىن ئالىرى ئالىرى ئالىرى ئالىرى ئالىرى ئالىرى ئالىرى ئالىرى	the state of the s
		alternative of the control of the co	dinguise with the control to a decorber of an extrament
	(c) Total Transfers (add 18(H) and 18(b))	2500 g	E 242690.08 Eyy to com Kr. Borne - Hondon Mondon Rossico
19.	Total Receipts (add Lines 11(d),	will make the secretary make the trade of the control of the contr	growing we replace to grade to the following of the control of the
	12, 13, 14, 15, 16, 17, and 18(c))	189880.42	2041013.65
	• • •	have the complete the same that the same	The color, the will make the beautiful out to the collection of the
20.	Total Federal Receipts	and the second second second second second second	grand and a comparing the product of any program of the com-
	4	407700 40	4700000 67

DETAILED SUMMARY PAGE

of Disbursements FEC Form 3X (Rev. 02/2003) Page 4 COLUMN A COLUMN B II. Disbursements **Total This Period** Calendar Year-to-Date 21. Operating Expenditures: Allocated Federal/Non-Federal Activity (from Schedule H4) 8855.98 239476,78 (i) Federal Share Manth 1987 1.3. Mark Green green 15388.4 425738.49 (ii) Non-Federal Share the self-resident state of the self-resident (b) Other Federal Operating 42772.83 529944.27 Expenditures and an ideas of **Total Operating Expenditures** 66817.21 1195157.54 (add 21(e)(i), (a)(ii), and (b)) ar e travella successor a mais efficientes e travellas est. Conserva de la maioria para la presenta en conserva de la conserva de la conserva de la conserva de la conserv 22. Transfers to Affiliated/Other Party Committees......Contributions to Federal Candidates/Committees and Other Political Committees... 23. Ω 24. Independent Expenditures 0 25. 0 0 0 31604.58 26. Loan Repayments Made...... 0 35800 R 0 0 (b) Political Party Committees (c) Other Political Committees 0 5000 (such as PACs)..... (d) Total Contribution Refunds 485 40899.6 (add Lines 28(a), (b), and (c))............ Alexander Services 2150 Λ 29. Other Disbursements 30. Federal Election Activity (2 U.S.C. §431(20)) (a) Allocated Federal Election Activity (from Schedule H6) 0 : 0 (i) Federal Share O (ii) "Levin" Share..... (b) Federal Election Activity Paid Entirely 822982.99 64886.38 With Federal Funds (c) Total Federal Election Activity (add .. 64886.38 822982.99 Lines 30(a)(i), 30(a)(ii) and 30(b)).... > 31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)).. 132168.59 2092794.71 32. Total Federal Disbursements (subtract Line 21(a)(il) and Line 30(a)(ii) 1667058.22 116780.19 from Line 31).....

mar Plans of Green William Co. The Co.

DETAILED SUMMARY PAGE

of Disbursements FEC Form 3X (Rev. 02/2003) Page 5 COLUMN A ill. Net Contributions/Operating Ex-COLUMN B **Total This Patiod** penditures Calendar Year-to-Date 33. Total Contributions (other than loans) 163857.43 1760870.07 (from Line 11(d), page 3) 34. Total Contribution Refunds 40899.6 (from Line 28(d))..... 35. Net Contributions (other than loans) 163192.43 (subtract Line 34 from Line 33) 36. Total Federal Operating Expenditures 769421.05 51428.81 (add Line 21(a)(i) and Line 21(b)) 37. Offsets to Operating Expenditures 3622.99 (from Line 15, page 3)..... 38. Net Operating Expenditures 47805.82 754074.98 (subtract Line 37 from Line 36)

Image# 11972768676

DEBTS AND OBLIGATIONS Excluding Loans NAME OF COMMITTEE (In Full) Republican Party of Minnesota		(Use separate schedule(s) for each numbered line)	FOR LINE NUMBER: (check only one)
A. Full Name (Last, First, Middle Initial) of De David Sturrock Mailing Address 1142 David Drive	ebtor or Creditor		Debt (Purpose): ativa/Satary/Overhead: Travel
City State Marshall	Zip Code MN 56258-3406		
Outstanding Balance Beginning This Period Amount Incurred This Period 58.34	Payment This Period	Outstand	ding Balance at Close of This Period
B. Full Name (Last, First, Middle Initial) of De Radisson St. Cloud Mailing Address 404 W Saint Germain Street		Administr	Debi (Purpose): ative/Salary/Overhead: Facility on Candidate
City State Saint Cloud	Zip Code MN 58301-3612	2	
Outstanding Balance Beginning This Period 1038.62 Amount Incurred This Period 2	Payment This Pedo	d Outstan	ding Balance at Close of This Period
C. Full Name (Last, First, Middle Initial) of C Resolution Graphics Mailing Address 3725 Dunian Street N	Debtor or Creditor		Debi (Purpose): pative/Sulany/Overhead: Party Printing
City Saint Paul	State Zip Code MN 55112-6968		
Outstanding Balance Beginning This Period Amount Incurred This Period \$ 5054.08	Payment This Perio	od Outstar 0 %	iding Balance at Close of This Period
SUBTOTALS This Period This Page (option TOTALS This Period (last page this line.nu	· · · · · · · · · · · · · · · · · · ·		enantinamente que resque en que en que en aprenentan en en en que en que en en en en en que en en en en en en e en en
TOTAL OUTSTANDING LOANS from Sche ADD 2) and 3) and carry forward to appropriate to app		ana onto b	182779.22
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HEDULE D (FEC Form 3)	()	(Us	se separate	PAGE 122 OF 137
BTS AND OBLIGATIONS) s	chedule(s)	FOR LINE NUMBER:
cluding Loans		1	for each nbered line)	(check only one) 9
ME OF COMMITTEE (In Full) epublican Party of Minnesota A. Full Name (Last, First, Middle Initial)			Nature of F	lebt (Purpose):
SMD Copy Systems Mailing Address 6520 W Lake Street				tive/Salary/Overhead: Equipment
			_]	
City State Minneapolis	· Zip Code MN	55426-4205		
Outstanding Balance Beginning This P Amount Incurred This Period	Paymen	t This Period	Outstand	ing Balance at Close of This Period
B. Full Name (Last, First, Middle Initial) AVVR Inc.		· · · · · · · · · · · · · · · · · · ·	Nature of C	Debt (Purpose): tive/Salary/Overhead: Party Sound
Mailing Address 3994 Cedarville Dr			1	
City State Eagen	Zip Code MN	55122	1	•
Outstanding Balance Beginning This F	Paymer	nt This Period O According to the second s	Outstand	ing Balance at Close of This Period
C. Full Name (Last, First, Middle Initial) A. J. Schaake Co	of Debtor or Creditor			Debi (Purpose): ative/Satary/Overhead; Name Plate
Mailing Address 919 Saint Clair Avenue)		7	
City Saint Paul	State MN	Zip Code 55105-3211		
Outstanding Balance Beginning This	Payme	nt This Period	Outstand	ding Balance at Close of This Perio
Affil was a three for the color black black the way				Parinda Parinda Residente de la Companya de la Companya de la Companya de la Companya de la Companya de la Com

4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) ▶

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3C	HEDULE D (FEC Form 3X)			<u></u>		PAGE 123 OF 137
	EBTS AND OBLIGATIONS				separate nedule(s)	FOR LINE NUMBER:
	cluding Loans				or each bered line)	(check only one)
	ME OF COMMITTEE (In Full)			1 10111	mio)	. 💢 10
	epublican Party of Minnesota					
	A. Full Name (Last, First, Middle Initial) of Debi	tor or Creditor				ebt (Purpose): tive/Salary/Overhead; Office Rent
	Hub Properties Trust				Aumuestra	uve/Salary/Overnead: Office Refit
	Malling Address Relt Management Research					
	330 2nd. Ave. 8 Suite 110	7to Code				
	City State Minneapolies	Zip Code MN	65401			
	Outstanding Balance Beginning This Period	Paym	ent This Period		Outstandi	on ID : SD10-DEBT846068 ng Balance at Close of This Period
	the state of the second st		terminist og god krigered som et det. Krigering og Blogered kom et det.	0	,	este est aprilipio operation operation of the second operation operati
	B. Full Name (Last, First, Middle Initial) of Debte	or or Creditor			Nature of C	lebt (Purpose):
	FLS Connect					tive/Salary/Overhead: Party g Telemarketing
	Mailing Address 7300 Hudson Boulevard N Suite 270		 ,		1	
	City State	Zip Code			1	
	Saint Paul	MN	55128-7143		L	
	Outstanding Balance Beginning This Period	Butter of the order of the good	nent This Period programme your process to a constant who we were	0	Outstand	ing Balance at Close of This Period
	C. Full Name (Last, First, Middle Initial) of Det	otor or Creditor				Debt (Purpose): ative/Salary/Overhead; Party
	Pinnacle Direct, Inc.					nive/SamiyiOverinezo; Party ng Mail/Non-Candidat
	Mailing Address 15260 113th Street N		 		1	
	City	State	Zip Code		1	
	Stilwater	MN	55082-9575			
	Outstanding Balance Beginning This Period	_		•		ation (D : SD10-DEBT845311
	Amount Incurred This Period	to the of temples and	ment This Period	D	E :	Ing Balance at Close of This Period
1)	SUBTOTALS This Period This Page (optional)		111001111111111111111111111111111111111	Þ	3	grangen (200 de) makengan ger ana giri s 85617,80 1. a Pisa kamanan Kisa di safa (1891 di ana pinagan grang makengan pangan sang Kisa di ana pinagan grang makengan pangan sang Kisa di ana
2) TOTALS This Period (last page this line numb	per only)		>	d Action is some	and the second of the second o
3	TOTAL OUTSTANDING LOANS from Schedu	le C (last page on	ly)	>	4	182779.22
4) ADD 2) and 3) and carry forward to appropris	ite line of Summa	y Page (last page	only) ▶	į.	182779.22

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SCHEDULE D (FEC Form 3X) PAGE 124 OF 137 (Use separate **DEBTS AND OBLIGATIONS** schedule(s) FOR LINE NUMBER: for each (check only one) 8 **Excluding Loans** numbered line) X 10 · NAME OF COMMITTEE (In Full) Republican Party of Minnesota A. Full Name (Last, First, Middle Initial) of Debtor or Creditor Nature of Debt (Purpose): Administrative/Salary/Overhead: Storage All American Self Storage Mailing Address 1500 Marshall Avenue State Zip Code Saint Paul MN 55104-6317 Transaction ID: SD10-DEBT868651 Outstanding Balance Beginning This Period But the street of the street o Payment This Period Amount Incurred This Period Outstanding Balance at Close of This Period 148 0 14R O ...) Se conserva de la compansión de la compansión de la compansión de la compansión de la compansión de la compansión B. Full Name (Last, First, Middle Initial) of Debtor or Creditor Nature of Debt (Purpose): Administrative/Salary/Overhead: Party Polling Tarrance Group Mailing Address 201 N Union Street <u>Suite 410</u> City State Zip Code Alexandria VA 22314-2649 Outstanding Balance Beginning This Period Transaction ID: SD10-DE9T839832 26127 with the or they described a manual transfer Amount Incurred This Period Payment This Period Outstanding Balance at Close of This Period ren i kangang pirang kantiga daga an agan ngan ngan papasa ay a mili ing kang palabaga daga daga na mili bigam Tangang pagang pirang kang pangga daga an agan ngan pagan ay a mili ing kang pangga ang daga daga na mili biga ATT . Same party 26127 0 D ZOLZE Zasam peda - Alman pelas Prometon de Parament a seria administrativament estiller alta esta mella estimação de fina, la cela a de la capita mella collega de Comunidado C. Full Name (Last, First, Middle Initial) of Debtor or Creditor Nature of Debt (Purpose): Administrative/Salary/Overhead: List Minnesota Dept of Health **Enhancement** Malling Address PO Box 64882 City State Zip Code 55164-0882 Saint Paul MN Outstanding Balance Beginning This Period Transaction ID: SD10-DEBT868658 O have be good attraction or willings to a second with Amount Incurred This Period Payment This Period Outstanding Balance at Close of This Period --- Award were to said as a fine 15 0 j. 1811 Bernelle i Marcif en Aren Bernelle i konflet i som i de 1) SUBTOTALS This Period This Page (optional). na diplomation in Albanya, tip on the Roman Light of Compiliation (i.e., and Compiliation) is a supplemental t The grant of the Compiliation of the Compiliation of the Compiliation of the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation of the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation of the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to the Compiliation (i.e., and in the Compiliation) is a supplemental to th 2) TOTALS This Period (last page this line number only)...... 182779.22 3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)..... and the Constitution of the second 182779.22 4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) ▶ Brand raine at the control of the regarder of the right

SCHEDULE D (FEC Form 3X	١		PAGE 125 OF 137
•	,	(Use separate schedule(s)	FOR LINE NUMBER:
DEBTS AND OBLIGATIONS		for each	(check anly one) 9
Excluding Loans		numbered line)	X 10
NAME OF COMMITTEE (In Full) Republican Party of Minnesota			
A. Full Name (Last, First, Middle Initial) o	of Debtor or Creditor	Nature of D	Pebl (Purpose):
Cardinals FEC Compliand	e Services		tive/Salary/Overhead: FEC e Servises/Accounting
Mailing Address 791 Holly Avenue Suite 300			
City State Saint Paul	Zip Code MN 55104-7135		
Outstanding Balance Beginning This Pt 42915.4	r	Transact	ion (D : SD10-DEBT865255
Amount incurred This Period	Payment This Period	Vitagion de genera O §	ing Balance at Close of This Period
B. Full Name (Last, First, Middle Initial) o Bryan Cave LLP	f Debtor or Creditor		Debt (Purpose): tive/Salary/Overhead; Legal Fees
Mailing Address 700 13th Street NW	·		
City State Washington	Zip Code DC 20005-3960		
AAROIM ON I			
Outstanding Balance Beginning This P	Payment This Period	Outstand	52 930.3
Outstanding Balance Beginning This P	Payment This Period	Outstance of the contract of t	Septiment of the Period Septim
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Outstanding Balance Beginning This P 52830.3 Amount Incurred This Period C. Full Name (Last, First, Middle Initial) Pinnacie List Company Mailing Address 2800 S Shirington Rea Suita 401 City Artington Outstanding Balance Beginning This F 4236.3	Payment This Period Of Debtor or Creditor State Zip Code VA 22206-3608	Outstance of Nature of Administrating	ling Balance at Close of This Perior 52830.3 Debt (Purpose):
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Outstanding Balance Beginning This P 52830.3 Amount Incurred This Period C. Full Name (Last, First, Middle Initial) Pinnacie List Company Malling Address 2800 S Shirington Rea Suita 401 City Artington Outstanding Balance Beginning This F 4236.3 Amount Incurred This Period	Payment This Period Ol Debtor or Creditor d State Zip Code VA 22206-3808 Payment This Period Payment This Period	Outstand Outstand Outstand Outstand Outstand	S2930.3 Debt (Purpose): ative/Salsty/Overhead: Generic Part) ction ID: SD10-DEBT831921 ding Balance at Close of This Period 4238.37
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Outstanding Balance Beginning This P 52830.3 Amount Incurred This Period C. Full Name (Last, First, Middle Initial) Pinnacle List Company Mailing Address 2800 s Shirington Rea Suita 401 City Artington Outstanding Balance Beginning This P 4236.3 Amount Incurred This Period 1) SUBTOTALS This Period This Page (o	Payment This Period of Debtor or Creditor d State Zip Code VA 22206-3608 Payment This Period 0 Payment This Period 0 ptional)	Outstand Printing Transa Outstand	52830.3 Debt (Purpose): ative/Salary/Overhead: Generic Party ction ID: SD10-DEBT831921 ding Balance at Close of This Period 4238.37

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SCHEDULE D (FEC Form 3X)		/I lea	separate	PAGE 128 OF 13
DEBTS AND OBLIGATIONS			edule(s)	FOR LINE NUMBER:
Excluding Loans			r each	(check anly one)
		numo	ered line)	X 10
NAME OF COMMITTEE (In Full) Republican Party of Minnesota				
A. Full Name (Last, First, Middle Initial) of Del	otor or Creditor		Nature of D	ebt (Purpose):
Cardmember Services			Administrati CC Payme	ive/Salary/Overhead; SEE BELOV ni
Malling Address PO Box 790408		•		
City State Saint Louis	Zip Code MO 63179-0400			
Outstanding Balance Beginning This Period			Transacti	on ID : SD10-DEBT967833
Amount incurred This Period	Payment This Period of the Per	1016	gan inga saga A	ng Balance at Close of This Peri (2009) The Company of the Compan
B. Full Name (Last, First, Middle Initial) of Det Popp.com	tor or Creditor			ebt (Purpose): tive/Salary/Overhead: Party Service
Mailing Address PO Box 27110				
City State Minneapolis	Zip Code MN 55427-011			
Outstanding Balance Beginning This Period Amount Incurred This Period 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	}	0	Outstandi	ing Balance at Close of This Period State of the Period State of t
Amount Incurred This Period	and a second and a second as a	0	Outstand	ing Balance at Close of This Peri
Amount Incurred This Period 3805.87 C. Full Name (Last, First, Middle Initial) of Di Strother Communications Gr Mailing Address 222 8 8th Street	and a second and a second as a	0	Outstand	ing Balance at Close of This Peri 3805.87
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SCHEDULE D (FEC Form 3X) PAGE 128 OF 137 (Use separate **DEBTS AND OBLIGATIONS** FOR LINE NUMBER: schedule(s) for each (check only one) **Excluding Loans** N 10 numbered line) NAME OF COMMITTEE (In Full) Republican Party of Minnesota Nature of Debt (Purpose): Administrative/Salary/Overhead: FEA A. Full Name (Last, First, Middle Initial) of Debtor or Creditor Ameriprise Financial Services, Inc. **Employeess IRA Contribution** Mailing Address 70205 Ameriprise Financial Center City State Zio Code Minneapolis MN 55474-0702 Outstanding Balance Beginning This Period Transaction ID: SD10-DEBT850226 7636.64 karana kan pada a 1981 sa sakaran 1964 sa Kabupatén Angalasa kan banga kilinga kabupatén ka Amount Incurred This Period **Payment This Period** Outstanding Balance at Close of This Period secured a Karak an emerge dissend south of 7636.64 The street of the said with rate with a sure of the street The complete state of the state B. Full Name (Last, First, Middle Initial) of Debtor or Creditor Nature of Debt (Purpose): Administrative/Salary/Overhead: Party Office Staples Business Advantage Supplies Mailing Address PO Box 83889 City Zip Code State Chicago 60696-0001 IL Outstanding Balance Beginning This Period Transaction ID : SD10-DEBTE68660 Specialism of the last of position of contract positions in the Amount Incurred This Period Payment This Period Outstanding Balance at Close of This Period endress characteristics resident the 931.95 931.95 market suit in the selection of the sele . An application of the contract contract contract the contract co C. Full Name (Last, First, Middle Initial) of Debtor or Creditor Nature of Debt (Purpose): Administrative/Salary/Overhead: Business Data Storage **Business Data Records** Mailing Address 201 9th Avenue SW City Zlp Code State Saint Paul . 55112-3211 MN Outstanding Balance Beginning This Period Transaction ID: SD10-DEBT868852 0 3 and a single a secretary with the first of the other Amount Incurred This Period Payment This Period Outstanding Balance at Close of This Period 258.88 258.88 عليمة والكريم بلوية والمعرسة الإنهاء والوجيد الانتهام والمراجية the selfic all configuration or an investment of taineathanning and mank on the ordinary describentable or ordinary 1) SUBTOTALS This Period This Page (optional)... and the state of t 2) TOTALS This Period (last page this line number only)...... 182779.22 3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) 182779.22 ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) ▶ mark a section of the mark some or the contract of the contract of

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StarTribune

State GOP \$2 million in debt

Articls by: BAIRD HELGESON Star Tribune December 30, 2011 - 11:17 PM

The Republican Party of Minnesota is \$2 million in debt heading into an expensive election year, including more than \$700,000 owed to havers in last year's substructural recount.

GOP officials released the new financial information Priday, disclosing previously unreported debts, credit card bills, and fices from the recount far greater than anyone expected.

Party leaders decided to release the report, including what they called 'ugly' information, in an effort to rebuild trust among voters,

activists and contributors. The new information showed a party burning through each far faster than it was taking it in as the former chairman did not disclose mountains of debt to party leaders.

Republicans sold that they found so immediate evidence of oriminal wangebing, but that they could not relo it out. "The people in the Republican Pasty need to know where we stand, wents and sil," said Jeff Johnson, a Republican National Committee member who led the review of party finances. "There are some warts in here."

Also Friday, the party's scenetary-treasurer, David Sturrock, resigned, saying in a letter to activists that the party needs someone in that position who does not live 160 miles from party headquarters and who has "significent financial management experience."

Sturrock files said secretary-treasurers "need to be informed more failty.... I was neither consulted nor informed about ...
2010 recount come. Also, the autoported obligations Mentifled by the current financial review even not known to mu."

It was another in a series of resignations by party leaders. Former chairman Tony Sulton resigned early this month article mounting pressure about party finances. He would not comment in detail Friday, but released a statement saying he desen't regret spending money to win control of the Lepislature for the first time in 40 years.

Businessman Mike Vekich, who helped the GOP dig through expenses, said they discovered \$415,211 in debt that had never been reported, in addition, the party owes \$100,000 in refunds to contributors and in checks that had been reported as paid but had not been sent to vendors.

Veloich and Johnson also discovered \$18,000 in credit card debt and \$200,000 in bank lines of credit that are tapped out. They are still trying to learn more details about the credit card exposues.

The GOP owes money to more than 60 entities, including thousands of dollars to local political consultants, its health insurance provider and oven \$797 to Kieran's Irish Pub.

All told, the party ower \$1.28 million, records show. That doesn't include \$717,000 in unpetd legal fees amassed during the gubernatorial recount between Republican Tons Emmer and Descorat Mark Dayton. Party officials any it remains uncker whether they are legally obligated to pay the recount debt, but lawyers who represented Emmer and the GOP insist the party is liable for the bills.

The latest financial information does not include a request to repay a \$75,000 contribution by Tom Petters, imprisoned on a conviction of orchestrating a \$3.65 billion Punzi-type scheme. Those representing Peders' receivership are asking that tith money be externed.

Republicans released the information a day before party activists most Saturday to select a new party chairman, who will have to pivot and focus on diagong the party out of debt. The activists will convene in St. Cloud to elect the chairman and settle on a path forward, which could include a more detailed, foreraic audit of party finances.

State GOP traders are already working with federal election officials to correct campaign finance reports during to 1609, which could result in steep fines.

The mounting finencial pressures bome on the party must find a way to wage campaigns to hold control of the Legislature, defeat President Obama and find a credible candidate to challenge Democratic U.S. Sen. Amy Klobuchar.

"We are committed to ensuring that the Republican Party of Minnesota is accountable for its actions and is more transparent with its information," said Kelly Fenton, deputy party chalmoman.

Johnson would not any orbedus: he thought Sutton, unantmously re-elected GOP chairman a year ago, had misled purty officials about the GOP's financial health. "I am not going to go there," he said.

The debt includes \$120,000 remaining on a \$170,000 fine levied by the Federal Election Commission from reporting discrepancies when Sution was party treasurer.

Republican executive committee members said they had been fighting with Sutton for months over the celesse of party financial information. They said they were not able to get some documents they needed until after Sutton resigned.



Jeff Interior of the Republican Mahanat Committee spoke at a firing news conference along and Mike Vehicle and Ketly

Before Sutton left, "we know we were being fied to," said executive committee member that Anderson, former state auditor. Sutton was "running wild" with party furances and "hidring bills not only from the executive committee, but regulatory agencies, even the treasurer."

Sutton said he would not respond to Anderson's allegations.

Johnson said he expects that everyone owed money by the GOP will eventually be paid, but he couldn't say when.

The new finance revelations cap what has been one of the most traumatic months in the history of the state GOP. Soon after Sutton left, Sonate Majority Leader Amy Koch resigned her leadership post after admitting she had an improper relationship with a Sonate staffer.

Republicans are not the only ones facing debt. The DFL Party started the year with about \$725,000 in rud ink. DFL Chair Ken Martin said the party has paid down more than \$500,000. "I anticipate that we will be completely out of debt by the middle of next year, for sure by the end of 2012," he said.

Baird Helgeson • 651-222-1288

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EXHIBIT 4

TwinCities • com

Minnesota Republican Party debt could top \$2 million

By Megan Boldt mboldt@pioneerpress.com

Updated: 12/31/2011 01:03:23 PM CST

The Minnesota Republican Party's debts total about \$2 million, Including more than \$700,000 in contested legal fees from the 2010 gubernatorial recount.

The party's financial treobles were no secret, but an internel review released Friday detailed the extent of the problems. It shows the party has obligations totaling \$1.3 million over and above the legal fees, including \$415,000 that hadn't been reported before and \$120,000 in Federal Election Commission fines.

"The debt number is higher than anyone wants it to be," said Jeff Johnson, chaliman of the party's executive committee and a Hennepin County commissioner. "There's some pretty ugly stuff in here."

Later Friday, party secretary-treasurer David Sturrock resigned, saying he needed to step aside to allow new leadership to make a fresh start.

Meanwhile, party leaders said they're working with election officials to correct campaign finance reports dating back to 2009, which could result in fines at the state and federal levels.

"Our intent is we're going to fix whatever we need to fix." Johnson said.

The financial news came on the eve of today's election of a Republican Party chairman. Party activists are in St. Cloud to pick a successor to former Chairman Tony Sutton, who quit Dec. 2 amid complaints of the escalating debt.

And it comes as Republicans try to reaintein majorities in the state House and Senate and unseat D emocratic U.S. Sen. Amy Klobuchar next year.

The party brought in

accountant Mike Vekich to review its finances. An audit would have taken months to complete, he said, and party leaders wanted the numbers released before today's chairmanship election.

"We are committed to making sure that the Republican Party of Minnesota is accountable for its actions and is more transparent with its information," acting chairwoman Kelly Fanton said.

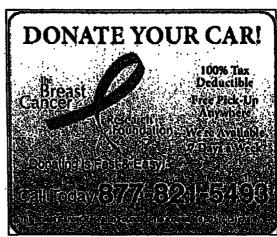
The analysis also found about \$18,000 in credit card debt incurred when Ron Carey chaired the party and \$200,000 taken out from lines of credit.

The findings did not include a request for the party to return a \$75,000 contribution from Tom Patters, who is serving a 50-year prison sentence for running a \$3.5 biflion Renzi seheme.

The \$719,000 in legal fees are from the recount in the 2010 gubernatorial election, which Republican Tom Emmer ultimately conceded to Democrat Mark Dayton.

Republican leaders say a separate entity created to fund the recount is responsible for the bills, but at least one of the recount attorneys told the Associated Press the party was the client.

It's unclear exactly how much the state GOP plans to spend next year. According to FEC filings, the party had spent about \$2.3 million as of Nov. 30 for the 2011-12 election cycle. It spent about \$9.5 million in 2009-10.



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TwinCities • com

Vekich said paying off the debt is possible.

Sutton defended his actions Friday, releasing a statement that said the debt reflects a hard-fought election during a difficult fundraising time.

"The legislative majorities won in 2010 were worth it, and the people of this state are better off for those GOP majorities," Sutton said.

Friday's confirmation of the party's financial straits was another setback in a turbulent month for the state GOP.

Two weeks ago, Senate Majority Leader Amy Koch of Buffalo resigned. The next day, it was revealed that she had had an inappropriate relationship with a Senate steffer. That same day, the Senate GOP's head spokesmen, Michaol Broekorb, lost his job. He had been the state party's deputy chairmen until October under Sutton.

In his resignation letter as secretary-treasurer, Sturrock said the GOP's new leaders need to "regain the confidence of activists, donors and voters in our ability to manage party finances."

He also said his successor must be better informed about the party's major financial commitments. Fer example, he soid, he wosn't teld about the attorney costs associated with the recount and didn't know about the \$415,000 in unreported obligations found in the financial review.

Vying today for party chairman are:

- Terry McCall, who chairs the 2nd Congressional District's Republicans.
- -- Lengtime pelitical operativo Pat Shoriridge.
- -- Commercial real estate broker Todd McIntyre.

Messages left for all three candidates were not immediately returned Friday.

It's not uncommon for parties to emerge in debt from an election year like 2910, said Alan Weinblatt, an attorney who has represented and advised Democrats on campaign finance lesues for almost four decodes.

But to have that debt lingering a year later - and of that magnitude - is unusual, he said.

"The dollar amount is quite large, and it doesn't seem to be going down," Weinblatt said.

The Minnesota DFL Party, for example, started this year \$725,000 in debt, the largest in the party's history, said party Chairman Ken Martin. Some of it was from last year's election, but some of the debt had accumulated from several election cycles.

Martin said the party came up with an aggressive fundraising plan and has paid off about \$500,000.

Megan Boldt can be reached at 651-228-5495. Follow her at twitter.com/meganboldt.



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